

**STATEMENT IN  
SUPPORT OF PROBABLE CAUSE**

IN RE: Cory Jonathan NEAL

I, Abelardo Gutierrez, declare and state as follows:

On March 18, 2023, a United States Border Patrol Agent (BPA) was working his assigned duties at the United States Border Patrol Immigration Checkpoint located on Interstate Highway 35 (IH-35) near the 29-mile marker north of Laredo, Texas in Webb County. At approximately 8:20 p.m., a gray passenger car with one visible occupant, later identified as Cory Jonathan NEAL (diver), arrived at his inspection lane. The BPA greeted NEAL and began his immigration inspection. While doing so a BPA canine advised the primary BPA that her service canine was alerting to the trunk of the vehicle. The BPA asked NEAL if he could check the vehicle trunk and NEAL responded, "yes". The BPAs opened the trunk and observed three subjects laying inside. An immigration inspection was conducted on all three subjects who admitted to being in the United States (U.S.) illegally. All subjects were placed under arrest and escorted inside the checkpoint for further investigation.

NEAL was read his Miranda Rights and acknowledged by signing DHS Service Form I-214. NEAL invoked his right to remain silent and refused to provide a statement without a lawyer.

Luis Gustavo XANEZ-Resendiz, a citizen of Mexico, is serving as a material witness in the case. XANEZ-Resendiz stated his family made financial arrangements to have him brought to the U.S. and paid \$8,000.00 United States Dollars (USD) to do so. XANEZ-Resendiz stated he crossed the river into the U.S. on March 17, 2023, with one other subject. He stated that two unknown males took him to a warehouse where he remained until March 18, 2023. XANEZ-Resendiz stated that on March 18, 2023, an unknown male took him to a shopping center and instructed him to enter a vehicle. XANEZ-Resendiz stated he entered the vehicle through the passenger door and observed NEAL sitting in the driver seat. XANEZ-Resendiz stated NEAL instructed him, in English and with hand signals, to lower the back seats. XANEZ-Resendiz stated he and the other two subjects crawled into the trunk and NEAL closed the seats behind him. XANEZ-Resendiz stated the vehicle started moving shortly after and didn't come to a stop until they arrived at the checkpoint. XANEZ-Resendiz was presented with a six-person photo lineup and positively identified NEAL as the driver. I declare (certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on the 19th of March, 2023 at Laredo, Texas.



---

Abelardo Gutierrez  
Border Patrol Agent  
United States Border Patrol

---